

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

V.

MARCUS HUNTER,

Defendant.

CRIMINAL NO. 2:16cr 10

18 U.S.C. § 1001(a)(3)

False Statement

(Counts 1-2)

INDICTMENT

May 2016 TERM - At Norfolk, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about January 4, 2016, in the Eastern District of Virginia, in a matter within the jurisdiction of the Transportation Security Administration (TSA), an agency within the executive branch of the government of the United States, the defendant MARCUS HUNTER, did knowingly and willfully make and use a materially false writing and document, that is HUNTER submitted to the TSA a forged and falsified reference letter purporting to be from B.S., in support of a Transportation Workers Identification Card application, knowing the reference letter to be forged and falsified at the time of its submission.

(In violation of 18 United States Code, Sections 1001(a)(3))

COUNT TWO

On or about January 4, 2016, in the Eastern District of Virginia, in a matter within the jurisdiction of the Transportation Security Administration (TSA), an agency within the executive branch of the government of the United States, the defendant MARCUS HUNTER, did knowingly and willfully make and use a materially false writing and document, that is HUNTER submitted to the TSA a forged and falsified reference letter purporting to be from J.K., in support of a Transportation Workers Identification Card application, knowing the reference letter to be forged and falsified at the time of its submission.

(In violation of 18 United States Code, Sections 1001(a)(3))

Sealed Pursuant to the
E-Government Act of 2002

United States v. Marcus Hunter.
Criminal No. 2:16cr 70

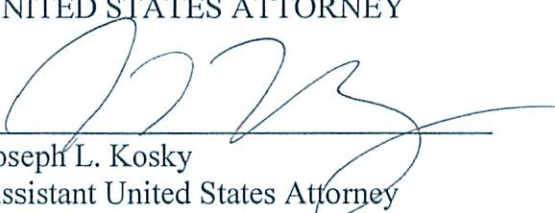
A TRUE BILL:

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FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



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